BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking on the Commission's Own Motion to Assess and Revise the Regulation of Telecommunications Utilities.	R.05-04-005 (Filed April 7, 2005)
Rulemaking for the Purposes of Revising General Order 96-A Regarding Informal Filings at the Commission.	R.98-07-038 (Filed July 23, 1998)

JOINT COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES AND THE UTILITY REFORM NETWORK ON ASSIGNED COMMISSIONER'S RULING ON HEARINGS

The Division of Ratepayer Advocates (DRA) and The Utility Reform Network (TURN) submit these Comments in response to the Assigned Commissioner's Ruling on Hearings Regarding AT&T Advice Letters and Ex Parte Ban, filed and served on or about August 6, 2007 (Ruling on Hearings). Pursuant to requests from DRA, TURN, and other parties, Assigned Administrative Law Judge (ALJ) Bemesderfer subsequently moved the date for comments from August 13 to August 17, 2007.

The Ruling on Hearings raises numerous issues about AT&T's unilateral changes to D.01-09-058, and asks for comment in several different areas: scheduling; scope; and other "issues raised regarding the AT&T advice letters."[1] One of the central issues, indeed one from which scheduling and scoping determinations follow, is that of proof – the burden of proof, and what proof, i.e., what evidence would justify the *post hoc* revision of a Commission Decision, which Decision was specifically tailored to remedy

[1] Ruling on Hearings, at 5.

repeated and persistent conduct abusive to consumers.[2] DRA/TURN will address that issue first, and then the scoping and scheduling issues.

Proof Issues

The Ruling on Hearings recognizes that what we have here is, in essence, a petition by AT&T to modify D.01-09-058,[3] and that AT&T has the burden of proof.[4] Rule 16.4(b) of the Commission's Rules of Practice and Procedure sets out with more specificity the proof required to justify modification of a Commission decision:

> A petition for modification of a Commission decision must concisely state the justification for the requested relief and must propose specific wording to carry out all requested modifications to the decision. **Any factual allegations must be supported with specific citations** to the record in the proceeding or to matters that may be officially noticed. **Allegations of new or changed facts must be supported by an appropriate declaration or affidavit**.[5]

AT&T must therefore make a specific showing that the conditions that led to the complaint and Commission Decision 01-09-058, and its commensurate imposition of the Rule 12 requirements, no longer apply. This is a high hurdle, as D.01-09-058 was based on *repeat* conduct, and the implicit conclusion that the conduct is likely to happen again.[6]

The Ruling on Hearings also misstates the *object* of proof. In seeking to modify D.01-09-058, AT&T is not required so much to "prove that its Rule 12 Advice Letters should *remain* in effect,"[7] but more to prove that the *departure* from D.01-09-058 and the

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[2] *See* D.01-09-058 and cases cited therein: *Turn v. Pacific Bell*, 49 CPUC 2d 299, 305 (D.93-05-062) (1993); *Pacific Bell Marketing Abuse Cases* at D. 86-05-072, 21 CPUC2d 182, D.90-02-043, 35 CPUC2d 488, 500; *First Financial Network v. Pacific Bell*, D.98-06-014, June 4, 1998, *quoting H.V. Welker v. P.T.&T Co.*, (1969) 69 CPUC 579.

[3] *Id.* at 5 (Commission "addressing whether effectively to modify D.01-09-058").

[4] *Id.* at 7.

[5] Emphasis added. This language is almost identical to the language of Former Rule 47.

[6] *See* D.01-09-058, Conclusions of Law 6-12; *see also* Ordering Paragraphs 6-10, and particularly Ordering Paragraph 7, setting a specific threshold of 60% of residential access lines as a necessary, but not necessarily sufficient reason, to repeal or amend Rule 12.

[7] Ruling on Hearings, at 7 (emphasis added).

Rule 12 requirements was justified in the first instance, and will not impede or diminish "just and reasonable"[8] utility service to utility customers.[9] DRA/TURN respectfully request that the object of proof be reframed in this manner.

In any showing justifying a departure from D.01-09-058, AT&T will have to demonstrate *how* it is now marketing the sorts of bundled packages (see discussion of "the Basics" in D.01-09-058) that led to consumer abuse in the 1980s and 1990s. AT&T's showing must at a minimum include current and planned scripts for such products, along with an explanation of how it intends to prevent the abuses that repeatedly befell its predecessors Pacific Bell and SBC.[10] Moreover, AT&T must demonstrate that changed market conditions are sufficient to have caused it to overhaul its marketing behaviors and that those modifications are irreversible. In particular, AT&T must demonstrate how new market conditions themselves ensure that AT&T will not allow AT&T to do things like up-sell more costly bundles than customers need, fail to disclose its least cost service alternatives in all customer marketing contacts, sell services before addressing customer requests, or sell services with deceptive names or product descriptions.

AT&T must also present and allow review of its recent customer complaint history, in order to demonstrate that the profit-seeking operations of an ILEC with overwhelming market share will not lead to continued consumer abuse. In prior proceedings, AT&T has frustrated such inquiries by claiming that it could not figure out

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[8] "Just and reasonable" remains the standard for all utility services, marketing and contract conditions, pursuant to P.U. Code § 451. *See, e.g.,* D.04-09-062 (*Cingular* decision); D.01-09-058, Conclusion of Law 2 ("Section 451 requires that all charges imposed by a public utility be just and reasonable and that all utilities' rules pertaining to or affecting a utility's charges or service to the public be just and reasonable") and 3 ("Charges obtained by means of misleading or confusing sales tactics are unjust and unreasonable").

[9] An inquiry of this sort should be focused on those who, because of economic status, lack of market acumen, or for other reasons have remained AT&T landline customers. AT&T will argue that these customers are no longer captive because of the plethora of communications alternatives in the marketplace today. The Commission must return to the *empirical question:* what percentage of residences in AT&T territory continue to be served by AT&T residential service? The continued dominant market share of AT&T shows that customers have not in fact found their way to market alternatives, perhaps a symptom that the theoretical marketplace has not materialized.

[10] See cases cited in fn. 2; *cf.* D.04-09-062.

what a complaint is, and did not have records of actual consumer "complaints" *per se*.[11] In this case and context, however, it is clear that "complaint" should mean any expression by the consumer that s/he was sold products and services without full disclosure, or on the basis of high-pressure, misleading or deceptive marketing tactics or practices.[12] A good proxy of customer discontent may, if necessary, be found in AT&T's billing and refund data – for example, what percentage of "bundled" sales results in adjustments or refunds, and for what reasons.[13] Complaint and refund information would clearly be relevant to issues 3 and 4, as identified in the Ruling on Hearings.[14]

While mindful that AT&T must and will put on its own case, the above description suggests the sort of detailed proof required both by the Commission's Rules and the specific findings of D.01-09-058, before the Commission can modify its prior Decision. Not only the factual findings of D.01-09-058, but also its Conclusions of Law and its Ordering Paragraphs, indicate how much the logic of D.01-09-058 still applies – perhaps even more so – in a "bundled world," and why consumers still need protection in today's market:

> 7. Pacific Bell's Tariff Rule 12 governs the offering of optional services to a customer. It states that Pacific Bell may call a customer's attention to the fact that optional services are available, that the customer may designate which services are desired, and that Pacific Bell must disclose all applicable recurring rates and nonrecurring charges for those services.

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[11] D.01-09-058, at pp. 9-10 ("Because Pacific Bell did not keep records of actual customer complaints, there is no way of knowing exactly how many customers have been affected by the marketing abuses found in today's decision"). Pacific Bell's representations in this regard were, however, not completely accurate. AT&T and its predecessor companies did and do keep customer service records that can be searched full-text for recurrence of words such as "disclosure," "deceptive," and "promised." AT&T and its successor have historically resisted providing access to such "complaint" or "customer inquiry" information.

[12] *Webster's Dictionary* defines "complaint" as "expression of … regret, discomfort, dissatisfaction … censure, or resentment; a finding fault." *Webster's New Twentieth Century Dictionary* at 371 (1975).

[13] In the *Cingular* investigation, I.02-06-003, staff discovered that Cingular did detailed studies of why customers terminated service, and in fact coded each termination and/or refund by reason.

[14] Ruling on Hearings, at 6. Issue 3 is "whether AT&T has reformed its processes to ensure that the marketing abuses found in C.98-04-004 do not occur," and Issue 4 is the "impact of AT&T's removal of the disclosure language from its Rule 12 tariff on consumers."

> 8. Tariff Rule 12 is required by the Commission's GO 96-A, which *requires* that each utility provide customers with up-to-date information regarding their service, and allow customers to choose from among any service options available to them.
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> 9. Implicit in the language of Tariff Rule 12 is the premise that a utility will not insist on giving customers information about optional services when customers do not wish to listen to such information.
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> 10. Tariff Rule 12 and Commission decisions require that when offering packages of services, a telecommunications utility must (1) offer basic exchange service apart from packages of optional services, (2) disclose that package components can be purchased separately, and (3) itemize each price on a stand- alone basis.[15]

The importance of Rule 12 is manifest in the changes to it ordered by the Commission in Ordering Paragraphs 7-9 of D.01-09-058:

> 7. Within 45 days of the effective date of this order, Pacific Bell shall file an advice letter modifying Tariff Rule 12 to create a clear distinction between customer service and sales or marketing efforts in conformance with the directives set out in Ordering Paragraph 8 and as described in Section 9.3 of this order. **This rule shall remain in effect so long as Pacific Bell serves 60% or more of residential access lines.**
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> 8. Revised Tariff Rule 12 shall provide that service representatives who answer inbound customer service calls must first fully address and resolve the customer's request. The service representative must describe the lowest-priced option for purchasing the requested services. After completely addressing all the customer's requests, the service representative shall summarize the customer's order including itemized prices, and inform the customer that the order is finished. After that, the service representative may inquire whether the customer is interested in hearing about other optional services. If the customer responds in the affirmative, only then may the service representative engage in unsolicited sales or marketing efforts.

[15] D.01-09-058, Conclusions 6-10.

> 9. Pacific Bell shall train its managers and service representatives on implementation of Ordering Paragraph 8.[16]

Included within the new Rule 12 requirements is also the requirement set out at Ordering Paragraph 6, that AT&T include "prices in all descriptions of optional services, and packages of such services, presented to customers."

These passages from D.01-09-058 indicate the breadth of the Commission's concern for consumers, particularly those at the core of the public switched telephone network; AT&T's burden of proof is commensurate with the specificity and breadth of these prior Commission Orders.

Scope

The Ruling on Hearings suggests four issues within the scope of this proceeding. Issue no. 1 asks "Whether the changed market conditions or any other events subsequent to the issuance of D.01-09-058 (including the findings of the URF Phase 1 decision) support the modifications made by AT&T's Rule 12 Advice Letters."

There are two problems with this first Issue, the first of which is relevancy. TURN has argued, and DRA agrees, that changing market conditions are irrelevant to the issue of whether consumer protection rules should apply to a company, such as AT&T, found to have engaged in deceptive and harmful practices. Even if the market were perfectly competitive, which it obviously is not, AT&T should not be abusing customers by making inaccurate, incomplete or misleading statements to sell more services - that is wrong no matter what the condition of the market (and of course is even more wrong in the existing market where AT&T has such market power). The real issue is what rules should be in place to ensure that carriers do not engage in conduct that harms consumers, whether the market has changed or not. On this view, Issue no. 1 should be removed from the scope of the hearings.

[16] D.01-09-058, Ordering Paragraphs 7-9 (emphasis added).

The second problem is that this question *assumes* that market conditions have materially and significantly changed for residential wireline customers, and that this fact was conclusively demonstrated by the URF Phase 1 decision. D.06-08-030, the URF Phase 1 decision, was a broad-spectrum analysis of the telecommunications market as a whole, and not of the population segment at which AT&T's abusive marketing was targeted, and for which the Commission's remedy was tailored: consumers who have retained their landlines, and particularly low-income, elderly, and non-English speaking populations most vulnerable to aggressive marketing.

The URF Phase 1 Decision made the following findings related to the extent of the residential wireline market, and whether wireless is in fact a substitute for wireline:

> 17. Verizon's survey data regarding customers who have "cut the cord" indicate that many customers consider mobile telephones and landline telephones to be close substitutes.
>
> 18. Verizon's evidence on the changing pattern of telecommunications use – such as the decrease in landline access lines coupled with the increase in mobile lines – makes it unreasonable to conclude that landline and mobile services are complements.
>
> 19. VoIP service qualifies as another close substitute to circuit-switched communications service. As compared to traditional circuit-switched voice communications service, VoIP frequently offers more features and functionalities at any given price point.
>
> 20. VoIP provided by cable telephone companies is a direct substitute for circuit-switched wireline service.
>
> 21. The historic practice of finding that each telecommunications service constitutes a separate "market" is no longer a relevant factor for analyzing or explaining the dynamics of today's technologically diverse voice communications environment.
>
> 22. AT&T witnesses Harris and Taylor convincingly demonstrate the obsolescence of historic market distinctions.

A substantial part of these findings relates to theoretical assumptions; none of these findings specifically addresses the subgroup of residential landline customers, or the low-income, elderly and minority consumers shown to have been victimized by AT&T's practices in the past. The facts antecedent to Issue no. 1 have not yet been established. Those facts are stark in their simplicity, and should be elicited and determined by this Commission: how many residences are there in AT&T's territory; how many are served by traditional PSTN landline by either AT&T or its competitors (in most cases reselling AT&T's product); what percentage of those traditional landlines are provided by AT&T directly; and what is the demographic profile of those landline subscribers. Or, in the words of the Commission's prior Order: does [AT&T] "serve 60% or more of residential access lines"? [17] *This issue may, in itself, be dispositive.*

Thus, if Issue no. 1 remains, it should be prefaced by the question of whether and how much "market conditions" have changed, and changed for the groups historically abused by the incumbent carrier, and specifically whether the incumbent carrier has at present 60% or more of residential access lines. Only then will the Commission be in a position to address Issue no. 1 as currently framed, i.e., assess whether those changed "conditions … support the modifications" in AT&T's advice letters.

One further note on scope: Issue no. 4, regarding the "impact of AT&T's removal of the disclosure language from its Rule 12 tariff on consumers," appears to ask for data that simply cannot be known at this point in time, if at all. To take the latter possibility first, this Issue essentially calls for the proof of a negative: that the recent AT&T advice letters and subsequent removal of Rule 12 disclosure language have caused no negative impact on customers. Second, it has been less than a year since AT&T's advice letters were filed. AT&T's attempt to remove the Rule 12 protections has been subject to challenge that entire time, and was obviously going to be subject to additional Commission examination before becoming irreversible. AT&T has been on notice that it

[17] D.01-09-058, Ordering Paragraph 7 (Rule 12 changes "shall remain in effect so long as Pacific Bell serves 60% or more of residential access lines").

would be unwise to make changes in its actual behavior relative to the Rule 12 changes *yet*.

Thus, *even if* it were conclusively shown that AT&T had no spike in complaints during the last year, this fact alone would not prove that customers are protected. The lack of complaints, if it could be shown, could have many causes, including but not limited to a temporary cessation of aggressive marketing, a cessation which is unlikely to be continued if historical patterns hold.[18] In any event, even assuming Issue no. 4 is capable of proof, such proof would require a deep look into AT&T's actual complaint, "inquiry," and adjustment/refund experience over the last year.

Scheduling

The above discussion demonstrates some of the thorny factual issues which AT&T's *de facto* Petition to Modify presents. As is clear from the Ruling on Hearings and Rule 16.4, AT&T will need to make a detailed showing (presumably in the form of prepared testimony) to carry its initial burden of proof. *Assuming that AT&T can carry that burden and present an adequate prima facie case for modification,* DRA/TURN and other parties must have the opportunity to test AT&T's showing through discovery,[19] and to present a rebuttal case. DRA/TURN and other parties will need time to gather actual customer information to assess if AT&T's behavior has changed since its filing to modify Rule 12.

DRA/TURN therefore propose that AT&T be required to promptly respond to parties' discovery regarding current issues including customer experience and marketing, that AT&T as "moving party" be given until mid- or late-September to serve prepared testimony on the parties, that AT&T be required to produce supporting and referenced materials with such testimony,[20] that DRA/TURN and other parties be given expedited

[18] *See, e.g.,* D.01-09-058, at p. 64 ("We find that Pacific Bell has essentially changed course and reinstated certain abusive marketing practices that we enjoined in 1986"); *see also* cases cited in fn. 2.

[19] DRA is not suggesting that it will simply wait until AT&T submits testimony – some limited and targeted discovery could commence immediately – but that discovery on issues specifically included in AT&T's testimony will necessarily have to wait until such testimony is served.

[20] The idea here is to expedite the proceedings by requiring AT&T to make immediately available, with

discovery rights on issues raised by such testimony, and at least 40 days to complete that discovery and prepare testimony. Hearings would be held in mid- November.

The Commission should weigh whether AT&T should be permitted any formal Reply testimony – if so, such testimony should be provided on an expedited basis, with all underlying and supporting documentation, at least ten days before the hearings begin.

DRA/TURN anticipate that they (separately or jointly) will have at least two expert witnesses to present its rebuttal case, one of whom will be out of the country and unavailable on November 5-6, 2007, and one unavailable after the Thanksgiving break. In light of the above, the November 5-6 dates set in the August 14, 2007 Notice of Evidentiary Hearing are too early. DRA/TURN request that testimony start no earlier than November 15, 2007.[21] DRA/TURN also believe that as many as four hearing days may be required.[22] DRA/TURN therefore propose the following schedule:

- September 24 – service of AT&T prepared testimony, and all supporting documentation and any materials consulted by AT&T's witnesses.
- October 1 – service of DRA/TURN/parties' discovery related to AT&T prepared testimony.
- October 10 – initial responses/answers by AT&T, as complete as possible.
- October 16 – final answers by AT&T.
- October 29 or 31 – service of rebuttal testimony (29th if reply testimony is to be allowed).
- November 5 – last day for service of reply testimony (if any).
- November 15, 16, 19, 20, 21 – hearings on any 3 or 4 of these days.

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the service of its prepared testimony, any and all supporting documentation, and any other materials relied on or consulted by its experts, at the time it serves its testimony.

[21] DRA/TURN had considered a November 12, 2007 start-date, but noted that the NARUC/NASUCA conventions run from November 12-14, 2007.

[22] The undersigned counsel for DRA recalls that the hearings preceding D.01-09-058 lasted for several weeks.

All service should be by hand, and electronically in Word and Acrobat format.

Respectfully submitted,

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I hereby certify that I have this day served a copy of "**JOINT COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES AND THE UTILITY REFORM NETWORK ON ASSIGNED COMMISSIONER'S RULING ON HEARINGS" IN R.05-04-005 BY USING THE FOLLOWING SERVICE:**

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/s/ NANCY SALYER

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